

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Ultra PRO International, LLC,)	
Plaintiff,)	Case No.: 24-cv-04725
v.)	Judge: Honorable Manish S. Shah
BCW Diversified, Inc.)	
Defendant.)	
)	

**UNOPPOSED MOTION FOR ENLARGEMENT OF TIME
TO RESPOND TO THE COMPLAINT**

Defendant, BCW Diversified, Inc., by its undersigned counsel, states as follows for its Unopposed Motion for Enlargement of Time:

1. Plaintiff filed this trademark action on June 6, 2024.
2. The Complaint was served on Defendant on June 11, 2024, and Defendant's responsive pleading, in absence of an extension, would be due on July 2, 2024.
3. The Complaint is relatively complex, consisting of twenty-seven counts including claims for trademark infringement under the Lanham Act involving seven separate trademarks, and includes additional claims for unlawful and deceptive practices under the laws of the State of Illinois.
4. In order to have sufficient time to respond to the Complaint, Defendant respectfully seeks an Order enlarging the time to respond to the Complaint to and including August 15, 2024.
5. Defendant's counsel conferred with Plaintiff's counsel who indicated that they have no objection to this motion or requested extension.

WHEREFORE, Defendant, BCW Diversified, Inc., respectfully requests that the Court grant the motion and enter an Order allowing Defendant to respond to the Complaint to and including August 15, 2024, and for any other or further relief this Court deems just.

Respectfully Submitted,

BCW Diversified, Inc.

BY: WilliamsMcCarthy LLP

/s/ Marc C. Gravino

Marc C. Gravino
John J. Holevas
Joel M. Huotari
WilliamsMcCarthy LLP
120 W. State Street, 4th Floor
P.O. Box 219
Rockford, IL 61105-0219
mgravino@wilmac.com
jholevas@wilmac.com
jhuotari@wilmac.com

CERTIFICATE OF SERVICE

The undersigned certifies that on the 21st day of June 2024, he caused a copy of the foregoing to be served via email upon:

Attorney for Plaintiff Ultra PRO International, LLC:

Kevin J. Keener, Esq. (#6296898)
KEENER & ASSOCIATES, P.C.
161 N. Clark Street, Suite #1600
Chicago, IL 60601
312-375-1573
Kevin.keener@keenerlegal.com

By: 

Marc C. Gravino, Esq.
John J. Holevas, Esq.
WILLIAMS MCCRATHY LLP
120 W. State Street, Suite 400
PO Box 219
Rockford, IL 61105-0219
mgravino@wilmac.com
jholevas@wilmac.com